

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

MICHELLE BROWN

PLAINTIFF

vs.

CAUSE NO.: 2:25-cv-00020-TBM-RPM

**PROFESSIONAL SECURITY
CORPORATION**

DEFENDANT

**DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION TO COMPEL ENTRY OF
DEFAULT**

Defendant Professional Security Corporation (“Defendant”) specially appears¹ and submits this response to *Pro se* Plaintiff Michelle Brown’s motion to compel filed at Doc. No. 22:

For the reasons explained in Doc. Nos. 12, 19, 20, and 21, *Pro se* Plaintiff’s motion to compel a default should be denied. In particular, no valid service has been effectuated, Defendant filed its motion to quash without any entry of default having been entered, *Pro se* Plaintiff improperly requested a default judgment without a Clerk’s entry having been entered, and defaults are disfavored under the law anyway.

Dated: July 2, 2025.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ G. Todd Butler

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¹ Defendant does not consent to jurisdiction and does not waive (and expressly preserves) any defenses to this action, including that it is not the real party in interest. *See, e.g., Powell v. Biloxi Police Dept.*, 2011 WL 2457857 (S.D. Miss. 2011) (acknowledging special appearance for purpose of contesting service).

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***Attorney for Defendant Professional
Security Corporation***

CERTIFICATE OF SERVICE

I, G. Todd Butler, certify that I had a copy of this Response electronically filed with the Clerk of the Court, using the CM/ECF system, and that I also had a copy mailed to *Pro se* Plaintiff at 1430 West 7th Street in Hattiesburg, MS 39401.

SO CERTIFIED, this the 2nd day of July, 2025.

/s/ G. Todd Butler
G. Todd Butler